



**SAN FRANCISCO
DEPARTMENT OF
TECHNOLOGY**

February 8, 2019

VIA ELECTRONIC FILING

Lisa M. Fowlkes, Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: DA 19-13, PS Docket No. 11-60, Comments
PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON IMPROVING
WIRELESS NETWORK RESILIENCY THROUGH ENCOURAGING COORDINATION WITH
POWER COMPANIES

Dear Chairman Ms. Fowlkes:

The City and County of San Francisco (San Francisco) respectfully submits these comments in response to the Commission's Public Notice DA 19-13. San Francisco applauds the Commission's interest in improving wireless network resiliency. The Commission is correct that coordination between wireless carriers and power companies to maintain and restore power is a critical component of disaster recovery. However, San Francisco recommends that the Commission support comprehensive coordination at the local and State levels. These efforts can address the interdependencies among the utility and transportation sectors that will be essential to recovery from an emergency. In this regard, the Commission should encourage the wireless industry to participate in comprehensive resiliency planning at the local, regional and State levels.

A broader approach that takes into account interdependencies between diverse sectors is essential to effectively address the power needs of wireless carriers. For example, in the event of a disaster in which power lines are severed, once battery back-up power is exhausted, wireless communications may need to rely on mobile generators or a resupply of fuel to fixed generators. In order to be successful, this will require coordination with the fuel, transportation and public works sectors to ensure that fuel is available and can reach those wireless facilities that can access those power sources. In line with local zero emissions efforts, identifying and encouraging alternative fuel generators or solar options can reduce greenhouse gas emissions while improving resilience. Prior planning focused solely on the wireless and power industries

might not be sufficient to restore power in these circumstances. Due to recent events, the Commission is appropriately concerned about improving response to hurricanes and flooding. Nonetheless, as the Chief Information Officer for San Francisco, I encourage the Commission to require the wireless industry to plan for all types of disasters, including earthquakes, wild-fires, tsunamis, tornados, severe winter storms and others. Recent wildfires in Northern California caused dozens of deaths and billions of dollars in property damages—resulting in PG&E filing for bankruptcy.

For these reasons, I also encourage the Commission to require the wireless industry to coordinate their resiliency plans and recovery efforts with state, regional and local planning and public safety agencies. This will allow the wireless industry, the power industry and other sectors to plan for scenarios that present the greatest local risks and address many unique local issues and concerns.

The Commission asks this question: “What industry or intergovernmental forums, either formal or informal, exist to promote coordination and joint planning between communications providers and power companies?”¹

Locally, San Francisco’s Office of Resilience and Capital Planning sponsors a “Lifelines Council” to coordinate comprehensive disaster planning among the utility, transportation and other sectors, including electricity and wireless industries.² San Francisco’s Lifelines Council was established by former Mayor Edwin Lee. After witnessing the devastation that Hurricane Katrina caused in New Orleans, Mayor Lee sought to identify investments San Francisco could make to ensure a rapid recovery from a major disaster.

The Lifelines Council came out of those efforts. The Lifelines Council includes our local electric and gas utility, PG&E, our largest communications providers, AT&T, Comcast and Verizon Wireless, as well as the local agencies responsible for water, fuel, highways, roads, transit, port, airport, wastewater, and fire suppression. Its function is to bring these public and private service providers together to develop a unified set of post event performance standards, both individually and collectively. The Lifelines Council Charter identifies the following objectives:³

- Develop and improve collaboration in the City and across the region
- Understand inter-system dependencies to enhance planning, restoration and reconstruction
- Share information about recovery plans, projects and priorities

¹ DA 19-13A1, Section A., Question 2.

² The term “Lifelines” refers to the “the systems and facilities that provide services vital to the function of an industrialized society and important to the emergency response and recovery after a natural disaster. These systems and facilities include communication, electric power, liquid fuel, natural gas, transportation (airports, highways, roads, ports, rail and transit), water, and wastewater.”

³ Lifelines Charter, <https://sfgov.org/orr/lifelines-council>.

- Establish coordination processes for lifeline restoration and recovery following a major disaster event.

The Lifelines Council issued its initial “Lifelines Interdependency Study Report”⁴ in 2014. The report analyzed existing interdependencies and recommended a five-year action plan to improve coordination. The Lifelines Council is currently working on a “Lifelines Restoration Performance Project”. The Project requires analyzing the current and desired restoration performance to develop a restoration improvement plan. The Project specifically is focused on addressing responses to major earthquakes. San Francisco’s Office of Resilience and Capital Planning has conducted extensive research, interviews of lifeline providers and hosted a cross sector workshop. It hopes to issue a plan in late 2019.

At the State level, existing organizations are leading cross sector and cross utility efforts to ensure a coordinated restoration process. The California Resiliency Alliance encourages cross sector disaster planning. It seeks to empower local and regional resiliency through cross-sector partnerships and information sharing.⁵ The California Resiliency Alliance has been instrumental in helping San Francisco in its restoration planning efforts.

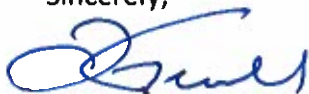
The California Utility Emergency Association (CUEA) provides a planning forum for private and public utilities. CUEA is comprised of private and public telecommunications, water, gas and electric utilities. It serves as a single point-of-contact between these critical infrastructure utilities, the California Office of Emergency Services (Cal OES) and other governmental agencies. Wireless carriers and electric utilities are active participants in the CUEA. In fact, the current chair is a representative of Verizon Wireless and the vice chair a representative of PG&E (the State’s largest electric and gas utility).

⁴ Lifelines Interdependency Study Report, Lifelines Council, Office of the City Administrator, <https://sfgov.org/orr/sites/default/files/documents/Lifelines%20Council%20Interdependency%20Study.pdf>

⁵ See the California Resiliency Alliance website: <https://caresiliency.org/>

San Francisco believes that a comprehensive approach to expediting recovery from a disaster must include all critical service sectors and be specifically tailored to local risks and environments. This type of coordination is best accomplished by existing local, regional and State programs. The Commission could support those efforts by encouraging wireless and other communications providers to work closely with local, regional, and State agencies.

Sincerely,



Linda Gerull

City Chief Information Officer, Executive Director Department of Technology